## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

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§	CIVIL ACTION NO. 3-09-CV-0298-N
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## **CERTIFICATE OF CONFERENCE**

Ralph S. Janvey, in his capacity as the Court-appointed Receiver for the Stanford Receivership Estate (the "Receiver"), the Official Stanford Investors Committee (the "Committee"), and Sandra Dorrell and Philip Wilkinson, individually and on behalf of a putative class of Stanford investors (collectively, the "Movants") respectfully submit this Certificate of Conference in support of the Expedited Request for Entry of Scheduling Order and Motion to Approve Proposed Settlement with Proskauer Rose LLP, to Approve the Proposed Notice of Settlement with Proskauer Rose LLP, to Enter the Bar Order, to Enter the Final Judgment and Bar Order, and for Plaintiff's Attorneys' Fees filed in this action on August 24, 2018 [ECF No. 2768] (the "Motion").

On September 6, 2018, Movants conferred with Janie Frank of the United States Securities & Exchange Commission (the "SEC") via email. The SEC does not oppose the Motion or approval of the Proskauer Rose settlement.

On September 7 and 10, 2018, Movants conferred via email with Manuel Lena, counsel for the United States (IRS). Mr. Lena has indicated that the IRS takes no position concerning the Motion or the Proskauer Rose settlement.

On September 7, 2018, Movants conferred via email with Jeff Tillotson, counsel for Laura Holt. Mr. Tillotson indicated that Ms. Holt takes no position concerning the Motion or the Proskauer Rose settlement.

On September 7, 2018, Movants conferred via email with Kenneth Johnston, counsel for Trustmark National Bank. Mr. Johnston indicated that Trustmark takes no position concerning the Motion or the Proskauer Rose settlement.

On September 6 and 7, 2018, Movants attempted to confer via email with Matthew Klecka, counsel for the United States Department of Justice (Fraud Division). Mr. Klecka did not respond to Movants' emails.

On September 7, 2018, Movants conferred via email with John Helms, counsel for Mark Kuhrt. Mr. Helms indicated that Mr. Kuhrt takes no position concerning the Motion or the Proskauer Rose settlement.

On September 7, 2018, Movants conferred via email with Cole Ramey, counsel for Gilbert Lopez. Mr. Ramey indicated that Mr. Lopez takes no position concerning the Motion or the Proskauer Rose settlement.

On September 6 and 7, 2018, Movants attempted to confer via email with David Finn, counsel for James Davis. Mr. Finn did not respond to Movants' emails.

Defendant R. Allen Stanford is proceeding pro se in this matter and is incarcerated;

accordingly, no conference was possible with Mr. Stanford. It is assumed he would oppose this

motion.

As of the filing of this Certificate, Defendant Leroy King has not appeared in this action

and, to Movants' knowledge, has not retained counsel with respect to this action. Accordingly,

no conference was possible with Mr. King.

Respectfully submitted,

CASTILLO SNYDER PC

By: /s/ Edward C. Snyder

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CERTIFICATE OF SERVICE

I hereby certify that on the 10<sup>th</sup> day of September, 2018, I electronically filed the foregoing document with the Clerk of the Court, using the CM/ECF system, which will send

notification of such filing to all counsel of record.

/s/ Edward C. Snyder

Edward C. Snyder